

From: [Eric Delgado](#)
To: [Nancy Jones](#)
Cc: [Paige Delgado](#); [Eric Delgado](#); [R6 DWH EUL@EPA](#); [R6 DWH REOC ESC@EPA](#); [R6 DWH PSC@EPA](#); [R6 DWH REOC PSC@EPA](#); [R6 DWH REOC RIC@EPA](#); [R6 DWH REOC RM@EPA](#)
Subject: Re: Fw: FW: Proposal for Joint Analysis Group
Date: 06/06/2010 12:41 PM

Thanks Nancy
we'll have the EU look into this

thanks

Eric Delgado
Federal On-Scene Coordinator
US EPA Region 6
1445 Ross Ave (6SF-PR)
Suite 1200
Dallas, TX 75202
214-437-9809

-----Nancy Jones/R6/USEPA/US wrote: -----

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To: "Paige Delgado" <Delgado.Paige@epamail.epa.gov>, "Eric Delgado" <Delgado.Eric@epamail.epa.gov>
From: Nancy Jones/R6/USEPA/US
Date: 06/06/2010 09:05AM
Subject: Fw: FW: Proposal for Joint Analysis Group
=====
See below

Sent by EPA Wireless E-Mail Services

----- Original Message -----
From: Dana Tulis
Sent: 06/06/2010 09:59 AM EDT
To: "Robert.Haddad" <Robert.Haddad@noaa.gov>
Cc: Beverly Banister; Bob Perciasepe; Chris Russell; Franklin Hill; Gary Bennett; Greg.Baker@noaa.gov; Jim McGuire; Lawrence Starfield; Lek Kadeli; Mark Hansen; Mary Wilkes; Mike Peyton; Nancy Jones; Rob.Ricker@noaa.gov; Ronnie Crossland; Scott Gordon; Shane Hitchcock; Stan Meiburg; Terry Smith; EOC Environmental Unit
Subject: RE: FW: Proposal for Joint Analysis Group

Hi Bob. I am asking Terry Smith to coordinate with Region 4 and Region 6 EUs on this request. We will get back to you. Thanks.

Dana S. Tulis
National Incident Coordinator
Office of Emergency Management
Environmental Protection Agency
202-564-8600

From: "Robert.Haddad" <Robert.Haddad@noaa.gov>
To: Stan Meiburg/R4/USEPA/US@EPA
Cc: Greg.Baker@noaa.gov, Rob.Ricker@noaa.gov, Bob Perciasepe/DC/USEPA/US@EPA, Dana Tulis/DC/USEPA/US@EPA, Mike Peyton/R4/USEPA/US@EPA, Chris Russell/R4/USEPA/US@EPA, Jim McGuire/R4/USEPA/US@EPA, Franklin Hill/R4/USEPA/US@EPA, Scott Gordon/R4/USEPA/US@EPA, Beverly Banister/R4/USEPA/US@EPA, Mary Wilkes/R4/USEPA/US@EPA, Gary Bennett/R4/USEPA/US@EPA, Lawrence Starfield/R6/USEPA/US@EPA, Nancy Jones/R6/USEPA/US@EPA, Ronnie Crossland/R6/USEPA/US@EPA, Mark Hansen/R6/USEPA/US@EPA, Shane Hitchcock/R4/USEPA/US@EPA, Lek Kadeli/DC/USEPA/US@EPA
Date: 06/06/2010 09:02 AM
Subject: RE: FW: Proposal for Joint Analysis Group

Thanks Stan - anything would be very much appreciated.

There are actually two issues:

(1) The hold time for the 8270 analysis - between collection and when we have to conduct the extraction. We'd like to either have some waiver that allows us to acidify the 1 liter samples on board and then provides a 14 day hold time prior to extraction. Alternatively, if we could 'fix' the sample immediately following collection with methylene chloride and have that either give us a 14 day hold prior to complete extraction, it would serve the same purpose.

(2) The second issue is the request for a waiver from EPA for the 40 day hold time once the semi volatile water sample is extracted. As we've seen through the email dialogues, this seems entirely arbitrary as long as the extract is held at 0C or lower. We would like to have the waiver allow for a 1 year holding time on these extracts.

We appreciate your help and please let us know if there is anything else we can do or provide. We currently have thousands of samples in the labs. Time is of the essence as we are concerned with losing samples -and because of the legal nature of the NRDA, we are using only labs that can provide the type of litigation quality data we need and that have been audited by our third-party lab auditing team.

Thanks again,
Bob

Robert Haddad, Ph.D.
Chief, Assessment & Restoration Division
NOAA/Office of Response & Restoration
Office: 301.713.4248x110
Cell: 240.328.9085
www.darrp.noaa.gov
www.response.restoration.noaa.gov

-----Original Message-----

From: Meiburg.Stan@epamail.epa.gov [mailto:Meiburg.Stan@epamail.epa.gov]
Sent: Saturday, June 05, 2010 11:18 PM
To: Robert.Haddad
Cc: Greg.Baker@noaa.gov; Rob.Ricker@noaa.gov; Perciasepe.Bob@epamail.epa.gov;
Tulis.Dana@epamail.epa.gov; Peyton.Mike@epamail.epa.gov; Russell.Chris@epamail.epa.gov;
McGuire.Jim@epamail.epa.gov; Hill.Franklin@epamail.epa.gov; Gordon.Scott@epamail.epa.gov;
Banister.Beverly@epamail.epa.gov; Wilkes.Mary@epamail.epa.gov; Bennett.Gary@epamail.epa.gov;
Starfield.Lawrence@epamail.epa.gov; Jones.Nancy@epamail.epa.gov; Crossland.Ronnie@epamail.epa.gov;
Hansen.Mark@epamail.epa.gov; Hitchcock.Shane@epamail.epa.gov; Kadeli.Lek@epamail.epa.gov
Subject: Re: FW: Proposal for Joint Analysis Group

Bob H., it was a pleasure meeting with you as well.

I think I understand the issue. From scrolling through the emails, it looks like you've certainly hit the right contacts at HQ, but I don't get the sense that we've given you an answer.

I suspect Region 4 acting alone won't be able to either. But with your question thus framed, I can work with Dana and other HQ folks to see if there is any kind of either waiver provision or whether, if this is a guidance, there is some reasonable flexibility which could be built in to our interpretation of SW 846 Method 8260, solely for the purpose of this response, to give NOAA and commercial laboratories some assurance that samples which exceeded holding times for certain contaminants (e.g., most SVOC's, PAHs) but which were handled in accordance with specified conditions (e.g., temperature) would remain analyzable for these contaminants.

As I understand it, that's what you're asking for. Did I get that right?

Stan

FW: Proposal for Joint Analysis Group

Robert.Haddad

to:
Stan Meiburg

06/05/2010 01:29 PM

Cc:
Rob.Ricker, Greg.Baker

Stan: Nice meeting and talking with you yesterday in Houma. Here is the email and holding-time issues we discussed. I suspect that Terry has been in further discussions with my staff, but it would be great to get something resolved – especially with the large number of samples we all have sitting at labs and the time constraints with collecting water at sea.

Please let me know if I can help in any way,

Cheers, Bob

Robert Haddad, Ph.D.
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From: Smith.Terry@epamail.epa.gov [mailto:Smith.Terry@epamail.epa.gov]
Sent: Sunday, May 30, 2010 11:24 PM
To: Robert.Haddad@noaa.gov
Cc: Tulis.Dana@epamail.epa.gov; Perciasepe.Bob@epamail.epa.gov;
Wilson.Gregory@epamail.epa.gov; Bob Perciasepe
Subject: Re: Proposal for Joint Analysis Group

Mr. Haddad:

Holding times for the volatiles (via SW 846 Method 8260) were set many years ago at 7 days if not acidified to ensure that the aromatic compounds such as benzene, toluene and Xylenes did not degrade through biological activity (biodegradation). We have found more recently that in reality benzene will completely biodegrade in water samples in about 24 hours if not acid preserved. The other aromatics will tend to biodegrade, but at a slower rate than benzene. Acid preservation at pH 2 does seem to prevent the biodegradation of the aromatics. The 14 day holding time for volatiles if acid preserved tends to ensure samples are analyzed before evaporation of the more volatile compounds occurs through the sample container seal, and ensures samples are analyzed before chemical degradation occurs (e.g. hydrolysis). Many of the chlorinated compounds applicable to the 8260 method are actually relatively stable, probably for months, and if the samples are kept cold (on ice), these will not escape through the sample container seal.

The 7 day holding time for the Method 8270 semivolatile compounds were established to ensure samples were analyzed before hydrolysis or other chemical degradation processes occurred in the sample container. In reality only a few of the compounds listed in Method 8270 will degrade this way. Most are probably stable in the container long after the 7 day holding time. EPA has performed an internal study that does show the PAHs to be stable for months, and technically there is no reason to extract these samples before the 7 day holding time. As far as the 40 day time for extracts to be analyzed. Unfortunately, this guidance was set probably more for convenience than science. If the extract vials are capped correctly and held at temperatures down to zero C, there probably will be no loss of analyte, especially for the oil related compounds we are mostly concerned about for the BP spill (PAHs, etc).

Now, what I have written above is from a scientific point of view and not a regulatory point of view. SW 846 is a guidance document. However, there are many state permit programs and laboratory accreditation programs that require laboratories to strictly adhere to the holding times written into SW 846. And these same holding time requirements are regulatory requirements for certified drinking water labs and waste water labs. Most environmental laboratories strive to meet these holding times, even if it means slowing down throughput.

I will more than likely be in the headquarters environmental unit tomorrow if you would like more discussion on this issue. Or feel free to call me at home. My cell number is 202-503-8981.

Terry Smith, Chemist
EPA Office of Emergency Management
202-564-2908
202-503-8981 cell

-----Dana Tulis/DC/USEPA/US wrote: -----
To: Bob Perciasepe/DC/USEPA/US@EPA, Gregory Wilson/DC/USEPA/US@EPA, Robert.Haddad@noaa.gov, "Terry Smith" <Smith.Terry@epamail.epa.gov>
From: Dana Tulis/DC/USEPA/US
Date: 05/30/2010 06:03PM
cc: "Bob Perciasepe" <perciasepe.bob@epa.gov>
Subject: Re: Proposal for Joint Analysis Group

Bob H, Terry can probably help you.

----- Original Message -----
From: Bob Perciasepe
Sent: 05/30/2010 05:54 PM EDT
To: Dana Tulis; Gregory Wilson
Subject: Fw: Proposal for Joint Analysis Group

Please get back to NOAA soon

Bob Perciasepe
Office of the Administrator
(o)202 564 4711
(c) 202 368 8193

----- Original Message -----
From: "Robert.Haddad" [Robert.Haddad@noaa.gov]
Sent: 05/30/2010 04:40 PM AST
To: Bob Perciasepe
Cc: 'Steve Murawski' <Steve.Murawski@noaa.gov>; 'David Kennedy' <David.Kennedy@noaa.gov>; Dave.Westerholm@noaa.gov; 'Rob Ricker' <Rob.Ricker@noaa.gov>
Subject: RE: Proposal for Joint Analysis Group

Bob: I have a different science question to ask. Maybe you can direct me to the appropriate person for answers.

In the EPA guidance (e.g., SW846, etc.), EPA lists holding times for various media and various analyte tests. Is there someone we can talk to about some of these? For example, for waters to be analyzed for PAHs (via 8270d) have a 7 day hold time before needing to be extracted. Yet, Volatiles (e.g., 8260) have a 7 day hold that can be extended to 14 days if the sample is acidified to <pH2. I'd like to understand that difference a little better. A similar question would involve the holding times for the extracts. Under EPA guidance, extracted samples (i.e., the extracts) can be held for 40 days prior to analysis. Yet we know that at -20 or -70 degrees, samples are held for up to a year before we see any problems.

The issues are simply with the magnitude of the samples that are being collected and the capacity of qualified labs to deal with these numbers.

If you could help me or point me in the right direction I'd be thankful,

Bob Haddad

Robert Haddad, Ph.D.
Chief, Assessment & Restoration Division
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Office: 301.713.4248x110
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www.response.restoration.noaa.gov

-----Original Message-----

From: Perciasepe.Bob@epamail.epa.gov [mailto:Perciasepe.Bob@epamail.epa.gov]
Sent: Sunday, May 30, 2010 2:16 PM
To: Steve Murawski; Anastas.Paul@epamail.epa.gov
Cc: Dave.Westerholm; Monica Medina; 'David.Kennedy@noaa.gov'; 'margaret.spring@noaa.gov'; 'william.connor@noaa.gov'; Robert Haddad
Subject: Re: Proposal for Joint Analysis Group

Thanks Steve.

We will configure here shortly. BTW Paul's wife is likely giving birth right now so I will get on this

Thanks for the quick turn around

Bob Perciasepe
Office of the Administrator
(o)202 564 4711
(c) 202 368 8193

----- Original Message -----

From: Steve Murawski [Steve.Murawski@noaa.gov]
Sent: 05/30/2010 01:27 PM AST
To: Bob Perciasepe; Paul Anastas
Cc: "Dave.Westerholm" <Dave.Westerholm@noaa.gov>; Monica Medina <Monica.Medina@noaa.gov>; "David.Kennedy@noaa.gov" <David.Kennedy@noaa.gov>; "margaret.spring@noaa.gov" <Margaret.Spring@noaa.gov>; "william.connor@noaa.gov" <William.Connor@noaa.gov>; Robert Haddad <Robert.Haddad@noaa.gov>
Subject: Proposal for Joint Analysis Group

Bob, Paul,

Based on our call and some internal discussion, here is a proposal for a Joint Analysis Group (JAG). I would like to finalize this and send to our Administrator. Marcia McNutt at USGS proposes membership as well.

thanks

Steve Murawski
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